

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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**THE DRAGONWOOD CONSERVANCY, INC.,  
PLEGUAR CORPORATION, &  
TERRY CULLEN**

Plaintiffs.

vs

*CASE# 16-534*

**PAUL FELICIAN &  
PHIL SIMMERT II**

Defendants

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**PLAINTIFFS MOTION FOR (PARTIAL) SUMMARY JUDGMENT**

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NOW COME PLAINTIFFS by undersigned counsel, and respectfully move the court for (partial) Summary Judgment in their favor and against Defendants -on the issue of liability, only- pursuant to FRCP 56 and other legal authority; for the reasons stated in the attached Brief in Support, and in Plaintiffs' Proposed Findings of Fact, submitted herewith.

WHEREFORE PLAINTIFFS request the court to grant (partial) summary judgment in their favor and against Defendants, and each of them, on the issue of liability, only

Date: October 1, 2020

*/s/ electronically signed by*

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